

MARQUIS AURBACH

10001 Park Run Drive  
Las Vegas, Nevada 89145  
(702) 382-0711 FAX: (702) 382-5816

**Marquis Aurbach**

Nick D. Crosby, Esq.  
Nevada Bar No. 8996  
Jackie V. Nichols, Esq.  
Nevada Bar No. 14246  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
Telephone: (702) 382-0711  
Facsimile: (702) 382-5816  
ncrosby@maclaw.com  
jnichols@maclaw.com

Attorneys for Defendants Las Vegas Metropolitan  
Police Department and Sheriff Joseph Lombardo

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

NEBYOU SOLOMON, an individual,

Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT; JOSEPH LOMBARDO,  
individual; DOE OFFICERS I - III,  
individuals,

Defendants.

Case Number:  
2:22-cv-00847-JCM-DJA

**STIPULATION AND ORDER TO  
EXTEND LVMPD DEFENDANTS'  
OPPOSITION TO PLAINTIFF'S  
MOTION FOR LEAVE TO FILE  
SECOND AMENDED COMPLAINT**

**(FIRST REQUEST)**

The Parties, Plaintiff Nebyou Solomon ("Plaintiff"), by and through their counsel of record, Margaret A. McLetchie, Esq. and Leo S. Wolpert, Esq., of McLetchie Law, and Defendants, the Las Vegas Metropolitan Police Department (the "Department" or "LVMPD") and Sheriff Joseph Lombardo, collectively ("LVMPD Defendants"), by and through their counsel of record, Nick D. Crosby, Esq. and Jackie V. Nichols, Esq., of Marquis Aurbach, and hereby agree and jointly stipulate the following:

1. The parties agree, due to defense counsel being out of the office and her inability to remotely access the file as a result of technical issues, to adequately respond to Plaintiff's Motion for Leave to File Second Amended Complaint [ECF No. 27], the deadline for LVMPD Defendants to file an Opposition to Plaintiff's Motion for Leave to File Second Amended Complaint shall be extended one week, from **April 17, 2023, to April 24, 2023.**

2. This is the first request for an extension of this deadline.

3. The Parties both submit that the instant stipulation is being offered in good faith and not for the purpose of delay.

IT IS SO STIPULATED.

Dated this 17th day of April, 2023  
MCLETCHIE LAW

Dated this 17th day of April, 2023  
MARQUIS AURBACH

By: /s/ Margaret A. McLetchie  
Margaret A. McLetchie, Esq.  
Nevada Bar No. 10931  
Leo S. Wolpert, Esq.  
Nevada Bar No. 12658  
602 South 10th Street  
Las Vegas, Nevada 89101  
Attorneys for Plaintiff Nebyou Solomon

By: /s/ Jackie V. Nichols  
Nick D. Crosby, Esq.  
Nevada Bar No. 8996  
Jackie V. Nichols, Esq.  
Nevada Bar No. 14246  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
Attorneys for Defendants Las Vegas  
Metropolitan Police Department and  
Sheriff Joseph Lombardo

**ORDER**

The above Stipulation is hereby GRANTED.

IT IS SO ORDERED this 18th day of April, 2023.

  
\_\_\_\_\_  
DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

MARQUIS AURBACH

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**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND LVMPD DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT (FIRST REQUEST)** with the Clerk of the Court for the United States District Court by using the court's CM/ECF system on the 17th day of April, 2023.

☒ I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

☐ I further certify that some of the participants in the case are not registered CM/ECF users. I have mailed the foregoing document by First-Class Mail, postage prepaid, or have dispatched it to a third party commercial carrier for delivery within 3 calendar days to the following non-CM/ECF participants:

N/A

/s/ Krista Busch

An employee of Marquis Aurbach

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